

1 JOSEPH T. McNALLY
2 Acting United States Attorney
3 LINDSEY GREER DOTSON
4 Assistant United States Attorney
5 Chief, Criminal Division
6 JONATHAN GALATZAN
7 Assistant United States Attorney
8 Chief, Asset Forfeiture and Recovery Section
9 VICTOR A. RODGERS
10 California Bar No. 101281
11 Assistant United States Attorney
12 Asset Forfeiture and Recovery Section
13 United States Courthouse, 11th Floor
14 312 North Spring Street
15 Los Angeles, California 90012
16 Telephone: (213) 894-2569
17 Facsimile: (213) 894-6269
18 E-mail: Victor.Rodgers@usdoj.gov

19
20 Attorneys for
21 UNITED STATES OF AMERICA

22 UNITED STATES DISTRICT COURT
23 FOR THE CENTRAL DISTRICT OF CALIFORNIA
24
25 WESTERN DIVISION

26 IN THE MATTER OF THE SEIZURE OF
27 \$6,189.00 IN U.S. CURRENCY,
28 \$3,384.00 IN U.S. CURRENCY,
1 \$6,738.00 IN U.S. CURRENCY,
2 \$7,826.00 IN U.S. CURRENCY,
3 CARTIER STYLE BRACELET, ROLEX
4 PRESIDENTIAL WATCH, AND 14K
5 YELLOW GOLD TENNIS NECKLACE

6 CR MISC. No. 2:25-cm-00037

7 STIPULATION EXTENDING UNITED
8 STATES OF AMERICA'S DEADLINE TO
9 FILE COMPLAINT FOR FORFEITURE;
10 [PROPOSED] ORDER THEREON LODGED
11 UNDER SEPARATE COVER

12
13 It is hereby stipulated by and between the United States of
14 America ("United States" or "the government") and claimant Carli
15 Cianciulli ("claimant"), by and through their respective attorneys,
16 as follows:

17 1. Pursuant to the claim that the United States alleges was
18 received by the Drug Enforcement Administration ("DEA") on January
19 14, 2025, claimant filed a claim in the DEA administrative forfeiture

1 proceedings to \$6,189.00 in U.S. Currency (United States Asset
2 Identification Number 25-DEA-716463), \$3,384.00 in U.S. Currency
3 (United States Asset Identification Number 25-DEA-716465), \$6,738.00
4 in U.S. Currency (United States Asset Identification Number 25-DEA-
5 716468), \$7,826.00 in U.S. Currency (United States Asset
6 Identification Number 25-DEA-716472), Cartier Style Bracelet (United
7 States Asset Identification Number 25-DEA-717539), Rolex Presidential
8 Watch (United States Asset Identification Number 25-DEA-717540), and
9 14K Yellow Gold Tennis Necklace (United States Asset Identification
10 Number 25-DEA-717542). The \$6,189.00 in U.S. Currency, \$3,384.00 in
11 U.S. Currency, \$6,738.00 in U.S. Currency, \$7,826.00 in U.S.
12 Currency, Cartier Style Bracelet, Rolex Presidential Watch, and 14K
13 Yellow Gold Tennis Necklace are hereinafter collectively referred to
14 as "the property."

15 2. It is the United States' position that the DEA sent the
16 written notice of intent to forfeit required by 18 U.S.C.
17 § 983(a)(3)(A) to all known interested parties, the time has expired
18 for any person to file a claim to the property under 18 U.S.C.
19 § 983(a)(2)(A)-(E), and no person other than claimant has filed a
20 claim to the property as required by law in the administrative
21 forfeiture proceedings.

22 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is
23 required to file a complaint for forfeiture against the property
24 alleging that the property is subject to forfeiture within 90 days
25 after a claim has been filed in the administrative forfeiture
proceedings, which in this case would be April 14, 2025, unless the
Court extends the deadline for good cause shown or by agreement of
the parties.

1 4. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish
2 by agreement to extend to July 14, 2025 the deadline by which the
3 United States is required to file a complaint for forfeiture against
4 the property alleging the property is subject to forfeiture, so that
5 the government can investigate this matter and determine whether this
6 matter can be resolved without the government having to file a
7 complaint.

8 5. Claimant knowingly, intelligently, and voluntarily gives
9 up any rights claimant may have under 18 U.S.C. § 983(a)(3)(A)-(C) to
10 require the United States to file a complaint for forfeiture against
11 the property alleging that the property is subject to forfeiture by
12 April 14, 2025 and any rights claimant may have to seek dismissal of
13 any complaint on the ground that it was not filed on or before such
14 date.

15 6. The parties agree that the deadline by which the United
16 States shall be required to file a complaint for forfeiture against
17 / / /

18 / / /

19 / / /

20 / / /

21 / / /

22 / / /

23 / / /

24 / / /

25 / / /

26 / / /

27 / / /

1 the property alleging that the property is subject to forfeiture
2 shall be extended to July 14, 2025.

3 SO STIPULATED.

4 Dated: March 20, 2025

JOSPEH T. McNALLY
Acting United States Attorney
LINDSEY GREER DOTSON
Assistant United States Attorney
Chief, Criminal Division
JONATHAN GALATZAN
Assistant United States Attorney
Chief, Asset Forfeiture & Recovery
Section

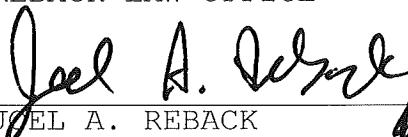


VICTOR A. RODGERS
Assistant United States Attorney
Asset Forfeiture and Recovery
Section

12 Attorneys for
13 UNITED STATES OF AMERICA

14 Dated: March 20, 2025

15 REBACK LAW OFFICE

16 
17 JOEL A. REBACK

18 Attorney for Claimant
CARLI CIANCIULLI

b) Victor A. Rodgers
Reb
E-mail
authorization

1 **PROOF OF SERVICE BY ELECTRONIC MAIL**

2 **AND BY FIRST CLASS MAIL**

3 I am over the age of 18 and not a party to the within action. I
4 am employed by the Office of the United States Attorney, Central
5 District of California. My business address is 312 North Spring
6 Street, 11th Floor, Los Angeles, California 90012.

7 On March 21, 2025, I served copies of: **STIPULATION EXTENDING**
8 **UNITED STATES OF AMERICA'S DEADLINE TO FILE COMPLAINT FOR FORFEITURE;**
9 **[PROPOSED] ORDER THEREON LODGED UNDER SEPARATE COVER** on each person
10 or entity named below:

11 **X** By Electronic Mail and by First Class Mail: By transmitting said
12 documents(s) to the email address and regular mailing address listed
13 below.

14 **Joel A. Reback, Esq.**
15 **REBACK LAW OFFICE**
16 **445 Central Ave., Suite 208**
17 **Cedarhurst, New York 11516**
joelrebackesq@aol.com

18 I declare under penalty of perjury under the laws of the United
19 States of America that I am employed in the office of a member of the
20 bar of this Court, at whose direction the service was made, and that
the foregoing is true and correct.

21 Executed on March 21, 2025, at Los Angeles, California.

22

/s/ Cecilia Anderson
23 **CECILIA ANDERSON**
24 Paralegal, FSA